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May 3, 2021

Honorable Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007  
*via ECF*

**Re: United States v. Victor DeJesus Ferreira,**  
**18 Cr. 173 (NRB)**

Your Honor:

I write to request a modification of Mr. DeJesus-Ferreira's bond conditions to permit the return of his wife, Karina Toribio's passport. As the Court will recall, the surrender of her passport to pretrial was one of Mr. DeJesus-Ferreira's release conditions. Ms. Toribio's father had died in the Dominican Republic and she wishes to travel there to pay her respects. She would also like to be freed of the obligation of returning her passport to pretrial.

Therefore, I request that the Court grant a modification of Mr. DeJesus-Ferreira's bond removing the condition that his wife, Karina Toribio's passport be held by pretrial. Mr. DeJesus-Ferreira has been released on a \$200,000.00 bond cosigned by eight financially responsible people, he surrendered his passport, and is on home detention with a monitor and the ability to work. Pretrial officer Joshua Rothman confirms that Mr. DeJesus-Ferreira has been completely compliant with his release conditions and that pretrial has no objection to the bond modification. The government, by Timothy Capozzi, Esq., consents to the modification.

Respectfully,

*Lisa Scolari*

Lisa Scolari

SO ORDERED:



HON. NAOMI REICE BUCHWALD

Dated: New York, New York  
May 4, 2021